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10 **IN THE UNITED STATES DISTRICT COURT**
11
12 **DISTRICT OF ARIZONA**

13 IN RE: Bard IVC Filters Products
14 Liability Litigation

No. MDL-15-2641-PHX-DGC

MOTION TO FILE UNDER SEAL

15 Plaintiffs' Counsel, Matthew R. McCarley for Fears Nachawati PLLC, respectfully
16 moves this Court for leave to file under seal their Objection to Recommendation to Appoint
17 Common Benefit Fee and Cost Committee and Request for Accounting. Plaintiffs' Co-
18 Lead Counsel and the PEC moved for leave to file the Recommendation to Appoint
19 Common Benefit Fee and Cost Committee under seal pursuant to Federal Rule of Civil
20 Procedure 26(c)(1)(G), Local Civil Rule 5.6, and this Court's sealed minute entry (Doc.
21 21432). It is in response to that request, and only in response to that request, that Plaintiffs
22 for leave to file under seal their Objection to Recommendation to Appoint Common Benefit
23 Fee And Cost Committee And Request For Accounting.

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25 Dated this 25th day of February 2020.
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Respectfully Submitted,

By: /s/ Matthew R. McCarley

Matthew R. McCarley

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CERTIFICATE OF SERVICE

I hereby certify that on this 25th day of February 2020, a copy of the foregoing pleading was filed electronically via the Court's electronic filing system. Those attorneys who are registered with the Court's electronic filing system may access this filing through the Court's system and notice of this filing will be sent to these parties by operation of the Court's electronic filing system.

/s/ Matthew R. McCarley